

LSK&D #: 574-9162 / 4866-8827-0757
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NAISHA MARTY-HERNANDEZ, on behalf of
herself and others similarly situated in the
proposed FLSA Collective Action,

Index No.: 1:23-cv-04637

Plaintiff,

-against-

**DEFENDANT DYNAMIC
HR SERVICES LLC
INITIAL DISCLOSURES**

SMILE NEW YORK OUTREACH, LLC, BIG
SMILES DENTAL NEW YORK, PLLC,
DYNAMIC HR SERVICES LLC, and ERIK
LAZAR,

Defendants.

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Defendant, DYNAMIC HR SERVICES LLC by its attorneys, LESTER SCHWAB
KATZ & DWYER, LLP, provides the following Initial Disclosures pursuant to Rule 26 (a)
(1) of the Federal Rules of Civil Procedure:

1. Names of individuals likely to have discoverable information that may
support the disclosing party's claims or defenses:

Christopher Whall, 3201 University Drive, Auburn, Michigan.

2. Description by category of documents that disclosing party may use to
support its claims or defenses:

- a. Initial employment offer correspondence signed by plaintiff between
1/16/18 and 1/22/18 and related document;
- b. Employee handbook acknowledgments signed by plaintiff on
1/22/18;
- c. Worksite Employer Services Agreement dated March 2016
between Dynamic HR Services LLC and Reachout Healthcare
America LLC;

- d. iSolved payroll records maintained electronically by Dynamic HR Services LLC;
- e. Dnet payroll records maintained electronically by Dynamic HR Services LLC;
- f. Time Card Reports maintained by Big Smiles Dental New York PLLC;
- g. Employee Handbook provided by Big Smiles Dental New York PLLC.

3. Computation of Damages

The disclosing defendant does not believe that plaintiff incurred any damages.

4. Insurance

The defendant does not believe it has insurance which will cover the categories of damages alleged by plaintiff.

Defendant reserves the right to amend, supplement or modify this disclosure for the course of this proceeding.

Dated: New York, New York
February 22, 2024

Respectfully submitted,

LESTER SCHWAB KATZ & DWYER, LLP

s/ *Richard Granofsky*

Richard Granofsky (RG-6382)
Attorneys for Defendant
DYNAMIC HR SERVICES LLC
100 Wall Street
New York, New York 10005
(212) 964-6611

TO:

Jason Mizrahi, Esq.
LEVIN-EPSTEIN & ASSOCIATES, P.C.
60 East 42nd Street
Suite 4700
New York, NY 10165
T: 212-792-0046
E: jason@levinepstein.com
Attorneys for Plaintiff

Vincent E. Polsinelli, Esq.
NIXON PEABODY LLP
677 Broadway
10th Floor
New York, NY 12207
T: 518-427-2650
E: vpolsinelli@nixonpeabody.com
Attorneys for Defendants
SMILE NEW YORK OUTREACH, LLC and
ERIK LAZAR

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LESTER SCHWAB KATZ & DWYER, LLP

ATTORNEYS FOR

Defendant

DYNAMIC HR SERVICES LLC

100 WALL STREET
NEW YORK, N.Y. 10005
(212) 964-6611
FAX: (212) 267-5916